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LANGUAGE ASSISTANCE PLAN EXECUTIVE SUMMARY

DECEMBER 2025

LANGUAGE ASSISTANCE PLAN

Executive Summary

REVISED December 2025

Prepared by:

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INTRODUCTION

ABOUT SAMTRANS

The San Mateo County Transit District (District) owns and operates SamTrans fixed route bus service and complementary ADA and non-ADA paratransit and shuttles in San Mateo County, California. As the county's mobility manager, the District facilitates interagency cooperation aimed at maximizing transit availability. The District's staff also administers two other agencies: the San Mateo County Transportation Authority and Caltrain, the commuter rail service owned by the Peninsula Corridor Joint Powers Board serving San Francisco, San Mateo, and Santa Clara Counties.

OVERVIEW

SamTrans' Language Assistance Plan (LAP) is the District's implementation plan for assuring that services and programs are accessible to those who may not speak English very well. According to the DOT's guidance, "recipients have considerable flexibility in developing a Language Assistance Plan, or LAP. An LAP shall, at a minimum: (a) Include the results of the Four-Factor Analysis, including a description of the LEP population(s) served; (b) Describe how the recipient provides language assistance services by language; (c) Describe how the recipient provides notice to Limited-English Proficient (LEP) persons about the availability of language assistance; (d) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations; (e) Describe how the recipient monitors, evaluates and updates the language access plan."

The four-factor LEP analysis includes:

- **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter a SamTrans program, activity, or service.
- **Factor 2:** The frequency with which LEP persons come in contact with SamTrans programs, activities, or services.
- **Factor 3:** The nature and importance of programs, activities, or services provided by SamTrans to the LEP population.
- **Factor 4:** The resources available to SamTrans and overall cost to provide LEP assistance.

Description of the LEP Populations Served

SamTrans' seven Safe Harbor languages are: Spanish, Chinese, Tagalog, Russian, Korean, Arabic, and Vietnamese. Using a variety of data sources, SamTrans has previously identified and grouped the Safe Harbor Languages into two different categories:

- **Tier One (Primary):** Spanish and Chinese (including Mandarin and Cantonese). The two languages spoken with the heaviest concentration in the District.
- **Tier Two (Secondary):** Tagalog, Russian, Korean, Arabic, and Vietnamese. The five additional languages meeting the Safe Harbor definition.

Notice to LEP Persons about Availability of Language Assistance

Federal guidance states that “Vital” written documents include complaint forms, written notices of important legal rights, documents that are critical for obtaining services and benefits, documents identifying upcoming fare and service changes, decreases in benefits or services, and notices advising LEP individuals of free language assistance. Vital documents can be exact translations or summaries of key contents.

The following table lists both vital and non-vital documents, categories of documents, and identifies the language category into which they should be translated. SamTrans may provide a summary, such as a fact sheet of a vital document or may offer oral language interpretation rather than written translation of a vital document. SamTrans uses the table as a starting point for discussion on what documents should be translated but also considers the specific population of outreach.

List of Vital Documents and Required Language Translations

<u>Document</u>	<u>Languages</u>	<u>Examples</u>	<u>Vital Document?</u>
Title VI Notices	All Safe Harbor Languages	Fixed Route Bus Ad Card	Yes
Safety and Security Information	All Safe Harbor Languages / Icons and Symbols to reach as many LEP riders as possible, regardless of language spoken and literary levels	Emergency Re Route	Depends on subject matter
Notice of Free Language Assistance	All Safe Harbor Languages		Yes
Legal Notices	All Safe Harbor Languages		Yes
Title VI Complaint Form and Procedures	All Safe Harbor Languages		Yes
Instructional or informational ridership brochures	Primary Secondary when requested	Take ones, Traveling Tips, Rider Guides	Yes
Applications to Participate in Programs, Benefits, and Services	Primary Secondary when requested	Paratransit Services, RTC Applications	Yes
Fare and Major Service Changes Notices	Primary Secondary when requested		Yes
Fare and Major Service Change Documentation/Analysis	Primary and Secondary as requested		No
Project Fact Sheets	Primary and Secondary as determined by location and/or as requested	Translated Fact Sheets/Summaries may be created in lieu of large document translations depending on the subject matter and cost	Depends on Subject Matter
Public Hearings	Primary (Meeting Notices) and Secondary as requested	Formal Notices, protocols to submit comments, presentation materials	Yes
Public Outreach	Primary (Meeting Notices) and Secondary languages as determined by location/as funding permits	Formal Notices, Documents that require public input, fact sheets, informational brochures with key information	Depends on Subject Matter
General Promotional Materials)/ Promotional Events	Primary and Secondary languages as determined by location and as funding permits	Fliers, brochures	No
Construction and Other Courtesy Notices	Primary and Secondary languages determined by location and as funding permits	Service Disruptions, Retrofits, Reroutes due to Events	No
Surveys	Primary as determined by location and as funding permits, oral interpretation by request		No

PURPOSE OF THE LANGUAGE ASSISTANCE PLAN

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that LEP persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States DOT published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Given the diversity of San Mateo County's population and SamTrans ridership, it is critical to provide language assistance. SamTrans' LAP includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

KEY FINDINGS

FACTOR 1:

The number or proportion of LEP persons in the service area who may be served or are likely to encounter a SamTrans program, activity, or service.

Factor 1 of the LEP plan was undertaken to assess the proportion of LEP individuals that may encounter or use SamTrans service. A number of data sources were used as a way to inform the conclusions, including the American Community Survey (U.S. Census Bureau), the California Department of Education English Language Learners for 2024-2025, information from the most recent MTC Ridership Survey of SamTrans riders, and SamTrans’ latest 2024 Triennial Customer Survey. Additionally, data on the existing interpretation and translation services provided through the SamTrans customer service department was also viewed to verify the top languages (Exhibit 12). The findings reveal the following about languages spoken in the SamTrans service area that will inform the Language Access Plan:

- 7 distinct languages qualify under the “Safe Harbor Provision” for written materials. While additional languages grouped together may fall into the Safe Harbor category, this number represents individual languages that are within the 5% or 1000-person threshold.
- Spanish, Chinese (including Mandarin and Cantonese) and Tagalog are consistently among the top 3 languages spoken at home and represented throughout the ridership. However, the Call Center Data indicates that Russian and Burmese resources may be additionally needed.
- Currently, SamTrans provides translations and interpretations in Simplified Chinese and Spanish. Ridership data indicates that Tagalog resources are also needed. Other communities also may have difficulty accessing information about SamTrans when provided in English.
- Similar to previous years, Language Line requests for Russian and Census data indicate a growing Russian-speaking LEP population in the SamTrans service area.
- While not present in Census data, Burmese language requests have also continued to increase in this past assessment.

Safe Harbor Languages

There are approximately 119,434 residents in the county who indicated they speak English less than “very well,” representing 17 percent of the populace. This Census percentage is lower than

the results of SamTrans' Triennial Customer Survey (2024) and Metropolitan Transportation Commission's Regional Transit Passenger Snapshot Survey (2023-2024) which are discussed below and both revealed a higher percentage of customers that speak English less than "very well."

In developing this Language Assistance Plan, the District has paid particular attention to the federal Department of Justice (DOJ) guidelines regarding the "Safe Harbor Provision" for translation of written materials. FTA Circular 4702.1B states the following with respect to the Safe Harbor Provision:

The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Seven language groups have more than 1,000 persons in San Mateo County who speak English less than "very well" and thus require translation of vital documents:

- Spanish
- Chinese
- Tagalog
- Russian
- Korean
- Arabic
- Vietnamese

While some of these groups represent a modest percentage of the county's population (Vietnamese speakers who speak English less than "very well" represent less than one-fifth of 1 percent of the county's population), they constitute at least 1,000 persons and thus qualify based on the Safe Harbor Provision. It is the District's responsibility to ensure these groups have access to vital documents translated into their language so they can participate in a meaningful way in the agency's decision-making process and stay informed regarding

the District’s business activities. “Vital” written documents include complaint forms, written notices of important legal rights, documents that are critical for obtaining services and benefits, documents identifying upcoming fare and service changes, and notices advising LEP individuals of free language assistance. These documents must be translated into the identified languages from Factor One and Factor Two for Title VI compliance.

The District currently translates most materials into Spanish, the language group that constitutes a share of more than 5% of the Safe Harbor Threshold, and Simplified Chinese, the next largest language group. Information such as schedule changes, community engagement opportunities, and paratransit programs have historically been translated in dominant languages in the community. These include Tagalog, Samoan, and Tongan. Outreach efforts have also included oral translation or written materials in Cantonese, Samoan, Tagalog, and Tongan. Community members requiring information in other languages or to provide input can also access oral interpretation services via the customer service interpretation hotline.

Linguistic Isolation

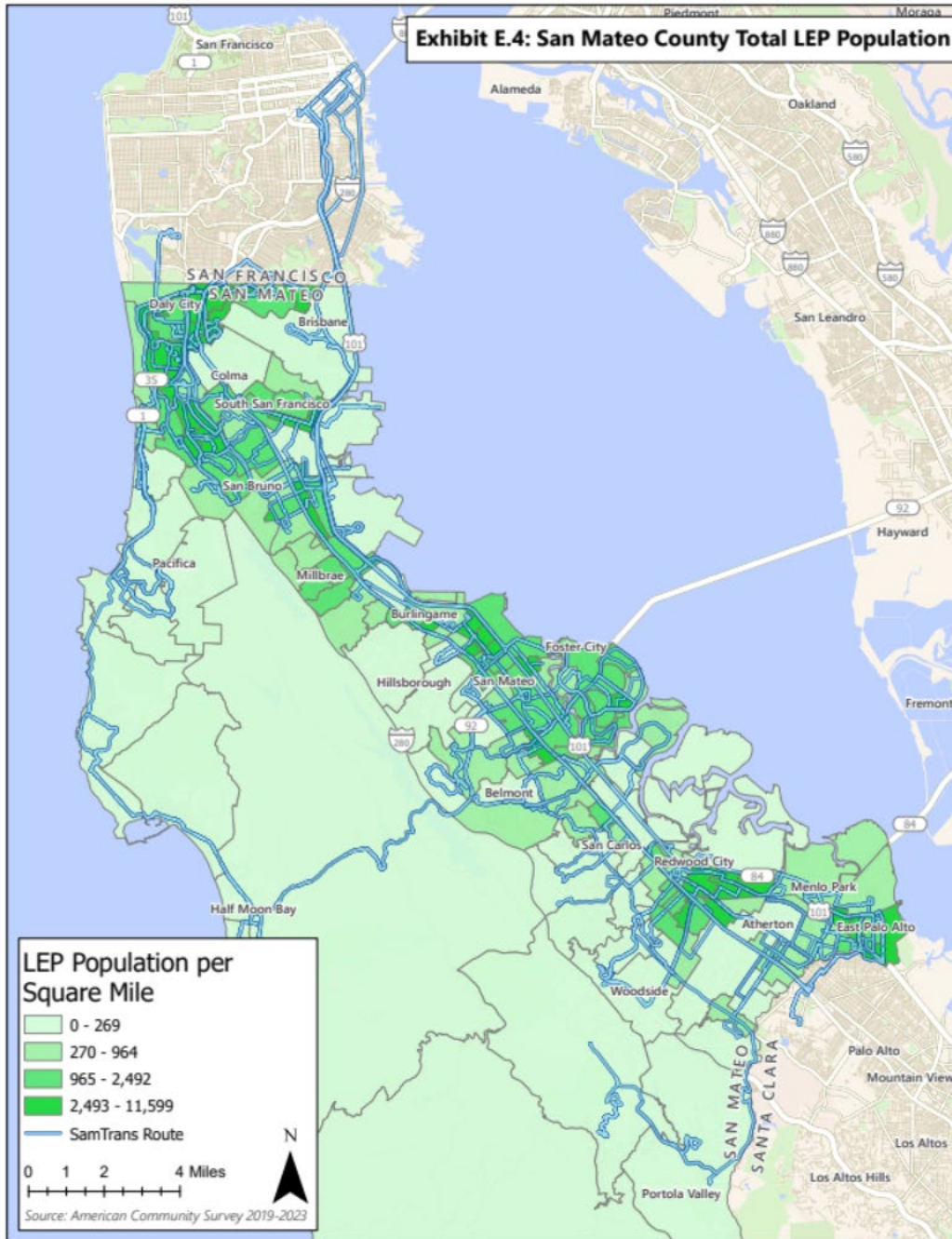
Additional data points were also analyzed using the American Community Survey (ACS) 5-year sample (2023) to help understand the percentage of the community that may be affected by language barriers. The Census defines a “linguistically isolated” household as one in which no member over the age of 14 speaks English “very well”, or the household members may face significant language barriers because they may not be able to rely on an adult relative who speaks English well to provide language assistance. The exhibit below shows that approximately 8% of all households in San Mateo County are linguistically isolated, which remains the same from 2022. Averages may not add to 100% due to sampling variance.

Linguistically Isolated Households in San Mateo County

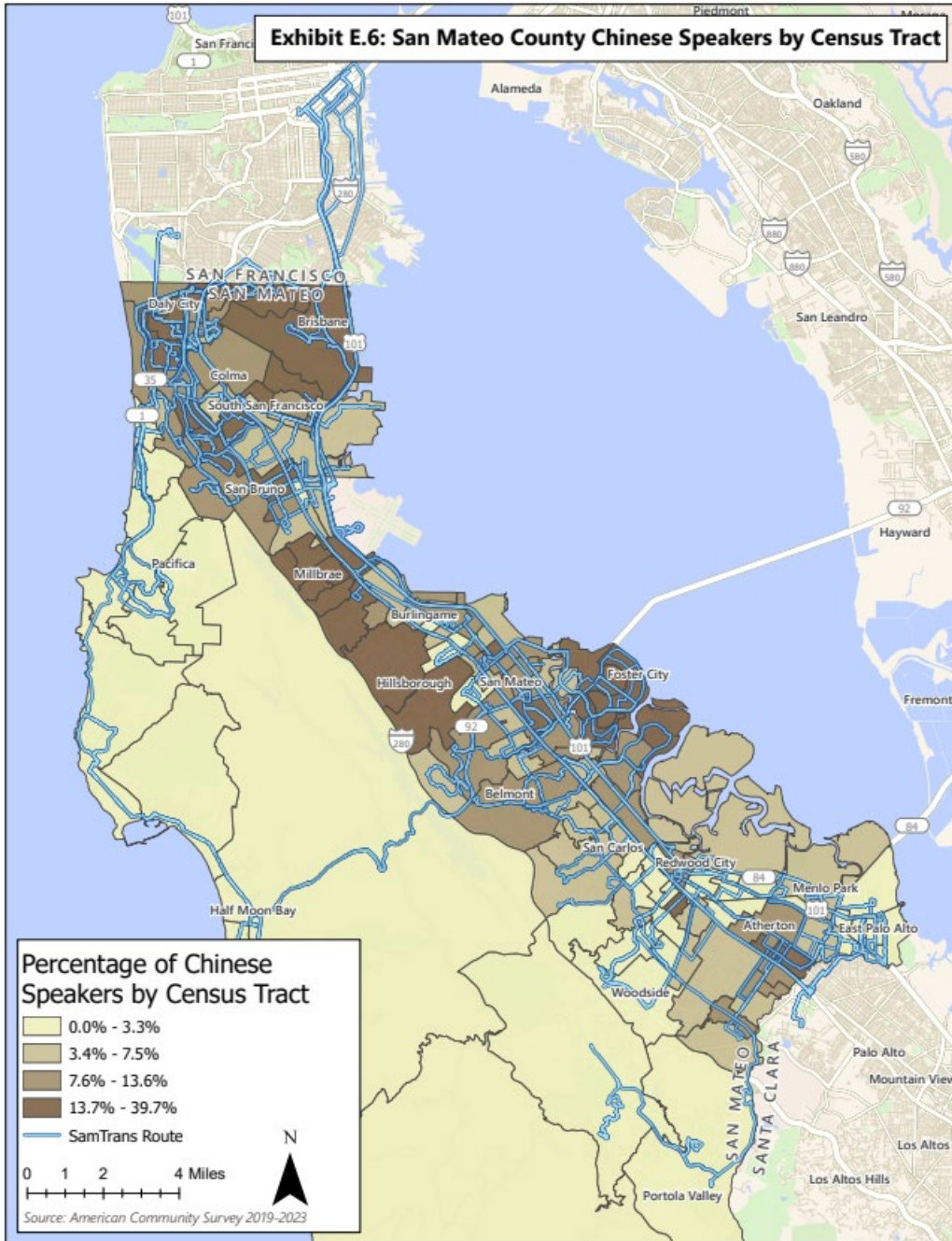
Linguistically Isolated Households in San Mateo County	Estimate	Percentage
All Households	21,007	7.9%
Spanish	6,891	16.4%
Other Indo-European Languages	2,703	11.2%
Asian And Pacific Island Languages	10,867	18.4%
Other Languages	546	15.6%

Concentrations of LEP Communities in the SamTrans Service Area

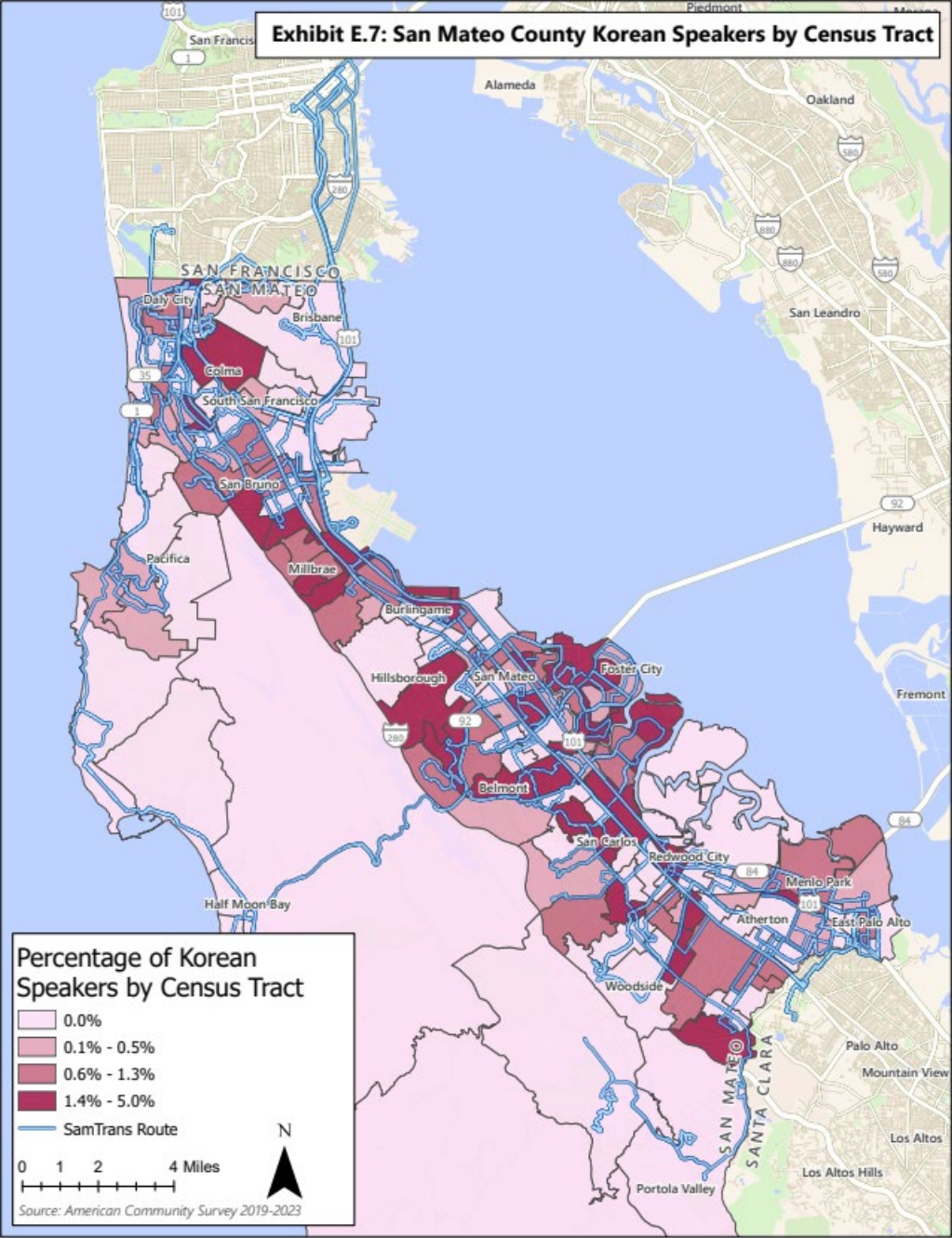
San Mateo County Total LEP Population



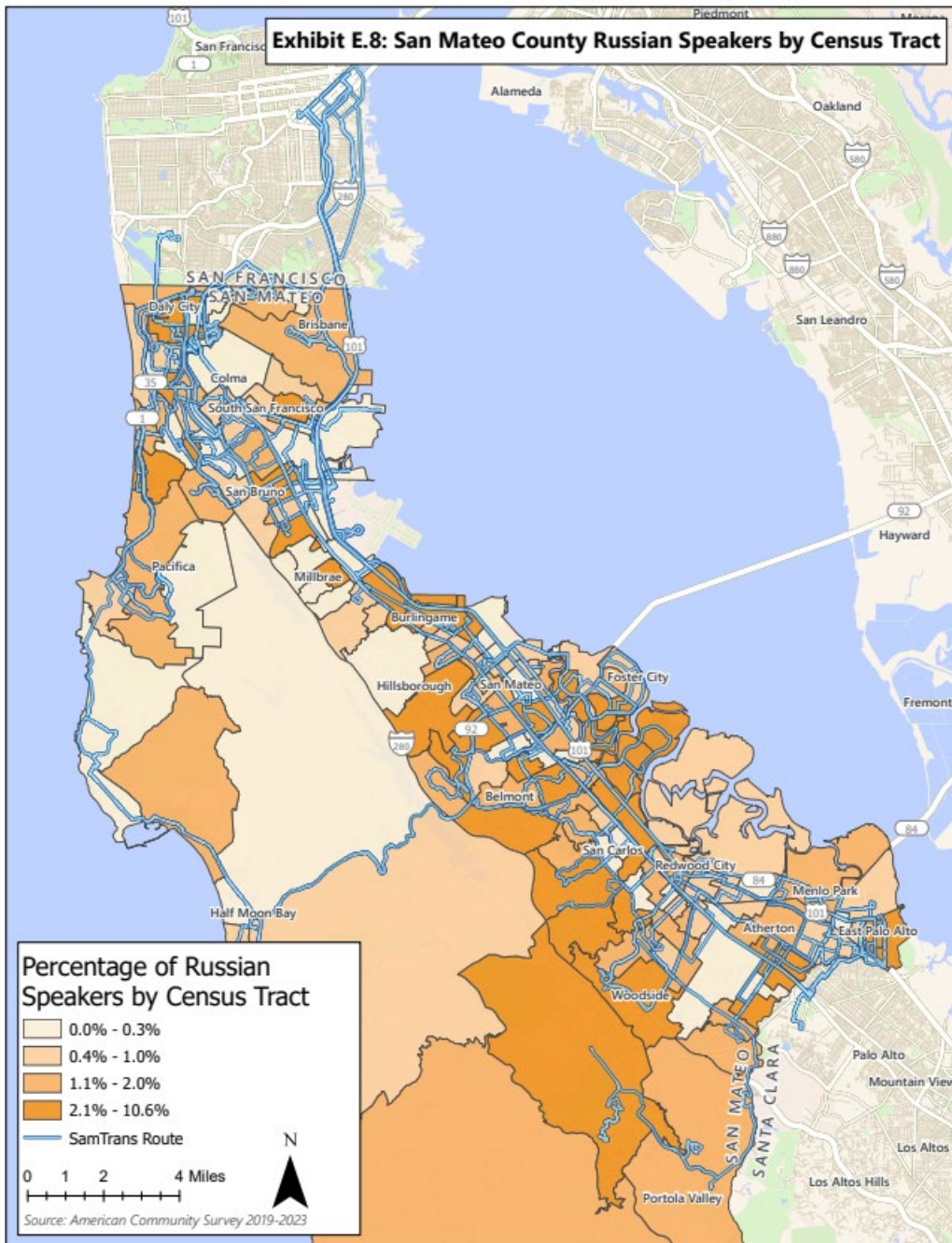
San Mateo County Chinese Speakers by Census Tract



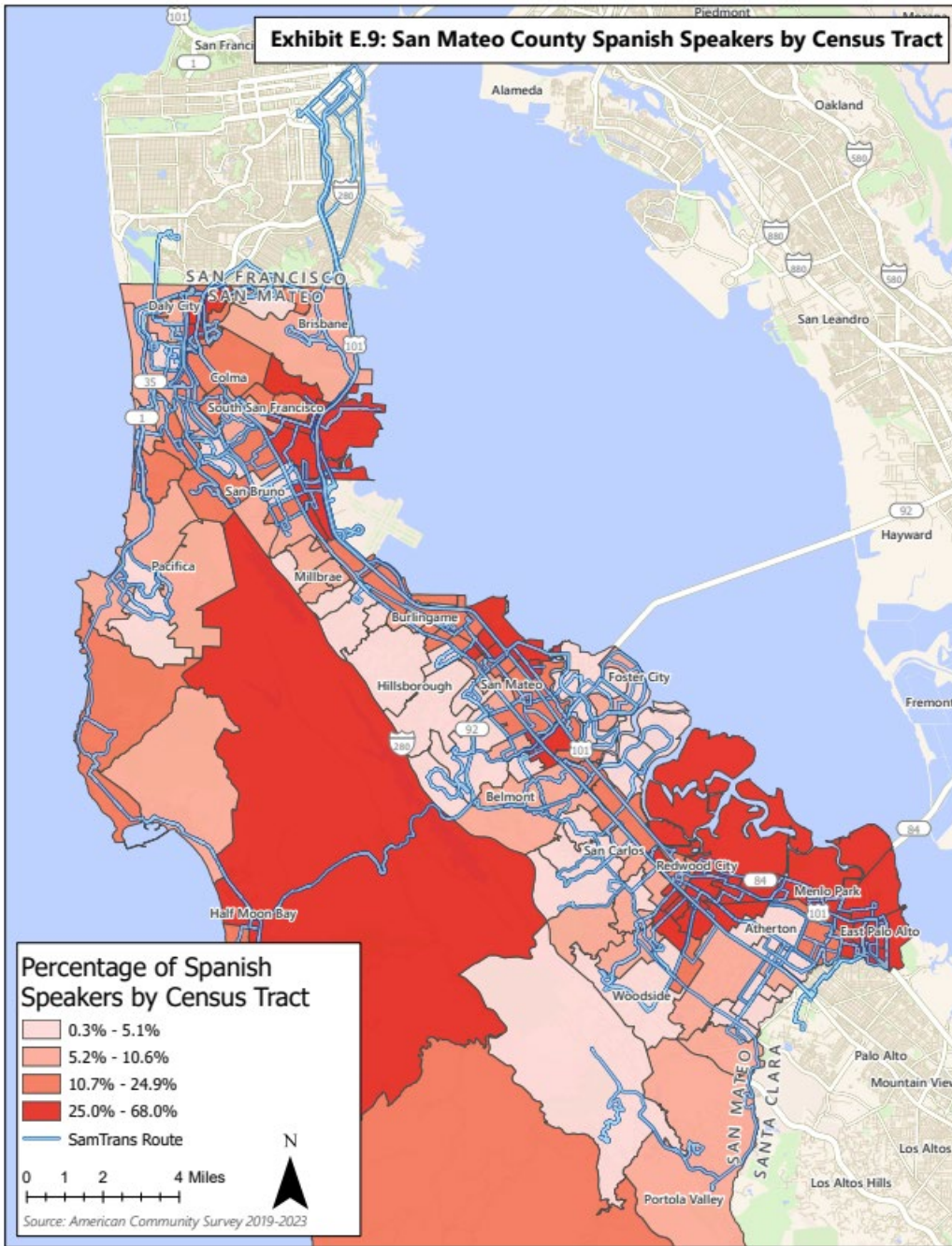
San Mateo County Korean Speakers by Census Tract



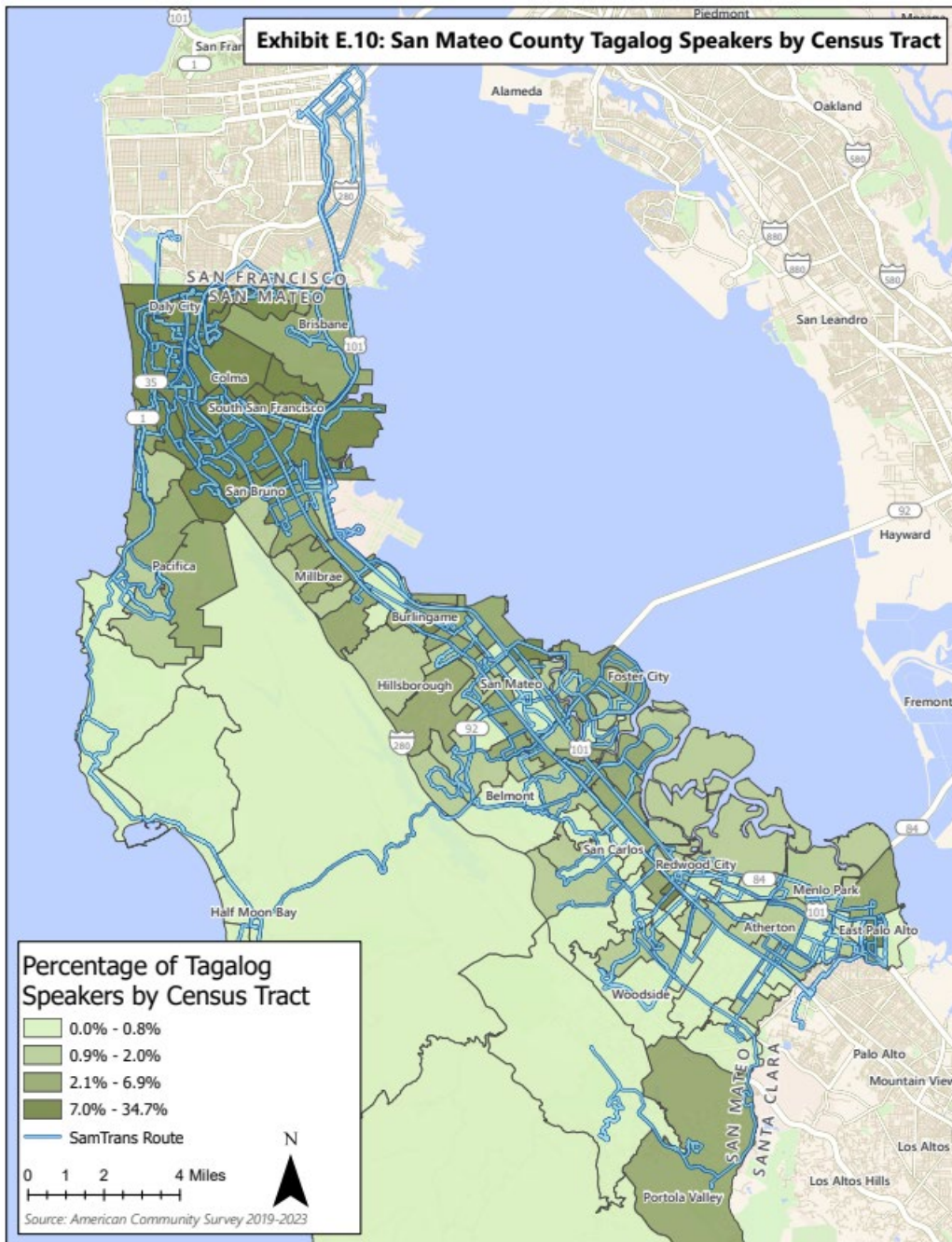
San Mateo County Russian Speakers by Census Tract



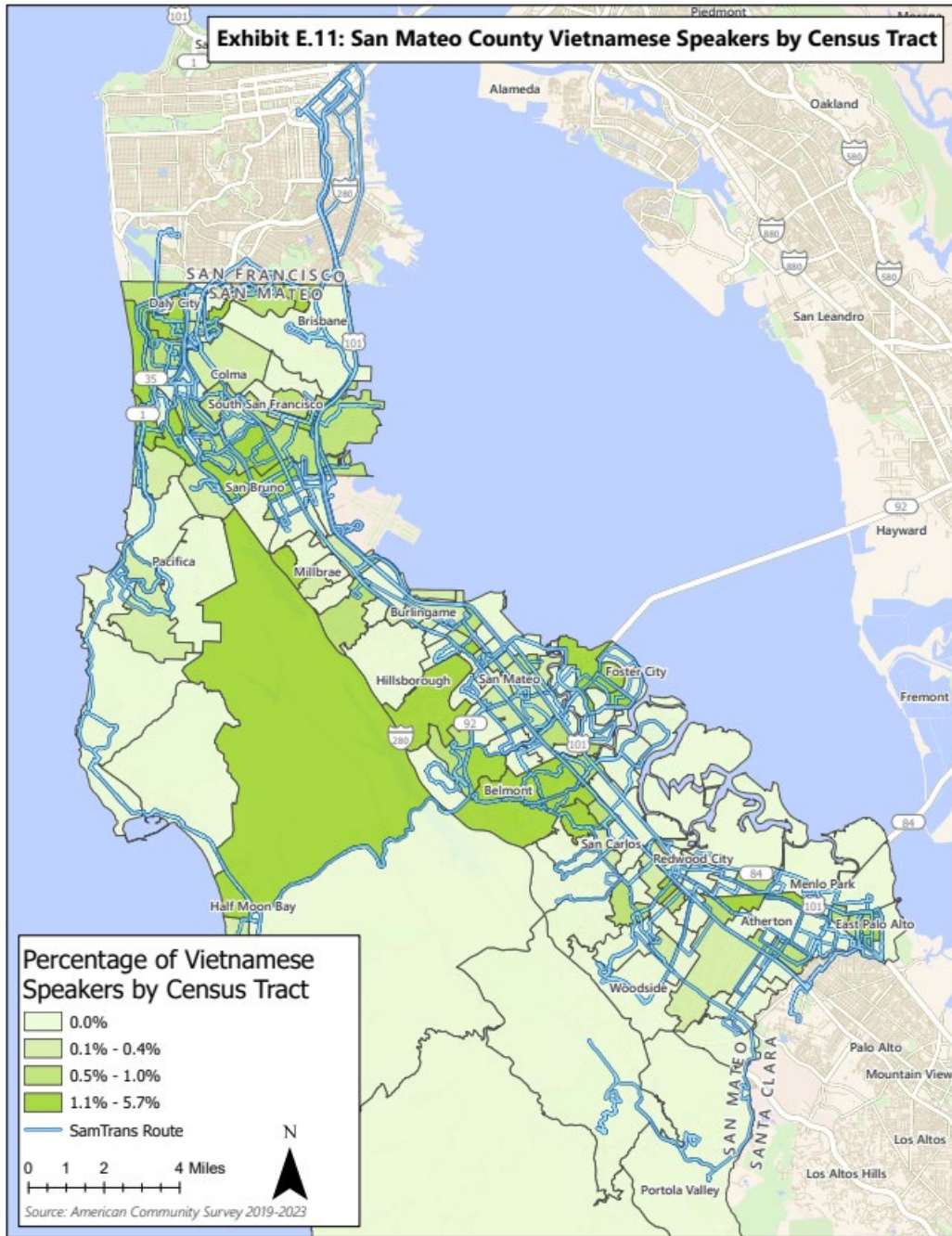
San Mateo County Spanish Speakers by Census Tract



San Mateo County Tagalog Speakers by Census Tract



San Mateo County Vietnamese Speakers by Census Tract



Language Assistance in the Customer Service Call Center

The District’s customer service call center, which is shared by SamTrans and Caltrain, handled over 43,500 calls from January 1, 2023 to September 30, 2025. To supplement information gathered via the U.S. Census, the District analyzed the number of calls coming through its call center which occurred in a language other than English. These numbers in Exhibit 12 below indicate the number of customer service calls for which staff utilized the language line. Approximately 17.7% of all calls required interpretation. The vast majority of non-English calls in this reporting period were in Spanish, with the next largest group in Mandarin or Cantonese. This confirms the 2023 ACS data that indicates that Chinese (including Mandarin and Cantonese) is the second largest language spoken at home in the service area. Unlike ACS data, ridership data, and call data of previous years, Russian translations surpassed Tagalog translations, becoming the third most-used language line translation for the reporting period. However, unlike the ACS data and ridership survey, Burmese was the sixth most-utilized language for interpretation.

Rider-Specific Languages Spoken at Home

The exhibit below illustrates the top five languages after English spoken by customers according to the Fall 2024 triennial customer survey over the prior seven years. While survey respondents and Census results indicated a similar degree of English as their primary language spoken at home, Spanish and Tagalog are spoken as a primary language more often among SamTrans customers than among county residents as a whole. There is a steep drop from Tagalog at 12% of respondents to Cantonese (4%) and Mandarin (4%) speakers. Overall, the triennial survey shows that language patterns have not radically changed. However, the percentage of SamTrans users speaking Spanish has continued to increase over the last few years.

Customer Language Usage

	2024 Total	2021 Total	2018 Total
Base-All Respondents	3,248	2,369	4,229
English	59%	75%	68%
Spanish	41%	37%	26%
Tagalog	12%	16%	17%
Cantonese	4%	4%	4%
Mandarin	4%	3%	3%
Hindi Or Other Indian Language	2%	1%	1%

The District has also analyzed results of the Metropolitan Transit Commission’s (MTC) most recent survey of the Bay Area, the Regional Transit Passenger Snapshot Survey (2023-2024). The survey asked riders for their primary language spoken at home and how well they speak English.

While the Snapshot Survey does not break down results by transit agency, the top languages of the survey’s results, Spanish and Chinese, align with the top two languages that SamTrans provides translations in. Compared to regional results, the SamTrans Origin and Destination Surveys conducted by MTC in 2022 and 2019 confirm SamTrans’ call center and triennial survey data that Tagalog is the second most spoken non-English language of SamTrans riders, after Spanish. Among customers that speak Chinese as their primary language at home, SamTrans is consistent with other regional agencies at 5% of all riders.

MTC Surveys of Customer Language Use

	2023-2024 Regional Snapshot Survey	2022 SamTrans Origin and Destination Survey	2019 SamTrans Origin and Destination Survey
<i>Base – all riders</i>	6,173,767	40,191	72,610
English	74%	47%	60%
Spanish	15%	37%	26%
Tagalog	-	7%	7%
Chinese	5%	5%	3%
Vietnamese	-	1%	-
Burmese	-	1%	1%
Russian	-	1%	<1%

FACTOR 2:

The frequency with which LEP persons come in contact with SamTrans programs, activities, or services.

Factor 2 of the LEP plan allows the District to identify how frequently riders and non-riders engage with SamTrans. While many online modes of information sharing are used for real-time information, the current data shows predominant engagement from English-speaking users. Reasons for this could include a) websites are not optimized for non-English language usage, b) material for LEP individuals is difficult to find on the website and c) LEP riders prefer telephone or paper than online information sources.

- During outreach for Ride Plus in East Palo Alto and Half Moon Bay, Spanish-speaking representatives from CBOs promoted the new on-demand service in various pop-up events to increase participation from LEP community members, including events geared toward youth and elderly riders. In addition to being hosted in larger community gathering spaces, such as festivals and transit centers, pop-up events were also held in trusted locations including churches, senior centers, and food distribution events with bilingual interpreters. Some methods bilingual staff reached out to the community included providing presentations with live Spanish interpretation, facilitating a process for community members to ask questions, and holding small group meetings with in-depth one-on-one questions and discussion of transportation challenges.
- As a result of supporting CBO outreach to LEP communities, SamTrans has developed a stronger partnership and trust with these CBOs and the LEP members they serve over the years. CBOs such as MidPen Moonridge Apartments and OYE Latinx Youth Conference have invited SamTrans to multiple events held by their organization for consecutive years to promote SamTrans transportation options with bilingual staff. LEP community members often turn to CBOs with their questions about transportation options and resources and having SamTrans present with the information helps to connect both sides. Some suggestions from CBOs on how to increase participation from LEP community members include having more bilingual staff at events and having a larger SamTrans presence at events put on in collaboration with the CBO.

Frequency of SamTrans usage by LEP Riders

As noted in Factor 1, English-speaking riders make up over half of SamTrans' ridership with the remainder speaking a wide range of languages. The onboard 2024 SamTrans Triennial Customer Survey found that 13.6% of the riders surveyed stated they did not speak English at all, which is an increase from 2021 when 6.5% of the ridership reported they did not speak English at all.

Using the survey data, it appears that a little less than half of SamTrans riders is LEP based on the sample size, but that the group includes significant proportion of relatively frequent riders, with nearly half riding at least 5 days per week or more.

Customer Use of Agency Technology:

SamTrans Mobile App Data

SamTrans' mobile application (App) is primarily used for purchasing passes and tickets for riding the bus. In Fiscal Year 2025, non-English Speakers account for approximately 21% of new users. Similar to Census, English Language Learner, and Ridership data, Spanish and Chinese are the top two non-English language used on the App with 7% and 5% of new users, respectively. Unlike the previous data sources, German is the next highest non-English language used on the App, accounting for nearly 2% of new users, and French is the fourth highest language with over 1.5% of new users.

Website

The SamTrans website is one of the most frequently used sources of information for SamTrans riders (see Exhibit 20). In fiscal year 2025, there were approximately 3.2 million unique page views. However, most of the users (90.5%) use the website in English. Only 6.55% of users access the website in Spanish and 2.6% of users access the site in Chinese. Even though Google Translate is available on the SamTrans website, website usage among LEP users is less frequent compared to other methods of communication (App, telephone calls, etc.). This may be due to inaccuracies in Automated Translation or how the website is formatted to allow the user to know of available language assistance. Given the high English use of the website, it is apparent that the website use does not reflect the actual demographics of the county or SamTrans ridership.

Community-Based Organization (CBO) Contacts

For the 2025 update, SamTrans continued to use its established partnerships and past experiences with targeted multilingual outreach to inform the strategies and needs of LEP communities. SamTrans staff found that these specific partnerships, through which CBOs are compensated for their time and brought in on specific outreach planning, increased multilingual participation in survey participation and public comment. Over the last three years, SamTrans embarked on CBO-led outreach to LEP community members for two larger projects, Ride Plus and the Central El Camino Multimodal Project, in addition to general outreach aimed at LEP community members.

CBO Contacts

CBO Name	Location	Languages Spoken by Community Served	Outreach Project
Anamatangi Polynesian Voices	East Palo Alto	Samoan, Tongan	Ride Plus
Belle Haven Action	Belle Haven, Menlo Park	Spanish	Ride Plus
Catholic Charities	San Mateo	Spanish	Central El Camino Multimodal Project
East Palo Alto Senior Center	East Palo Alto	Spanish	Ride Plus
El Concilio	South San Francisco	Spanish	General SamTrans Outreach
MidPen – Moonridge Apartments	Half Moon Bay	Spanish	Ride Plus
Nuestra Casa	East Palo Alto	Spanish, Samoan, Tongan	Ride Plus
Orgullo y Educacion (OYE) Latinx Youth Conference	Redwood City	Spanish	General SamTrans Outreach
Pilipino Bayanihan Resource Center	Daly City	Tagalog	General SamTrans Outreach
Puente de la Costa Sur	Pescadero	Spanish	General SamTrans Outreach
Self Help for the Elderly	San Mateo	Cantonese, Mandarin	General SamTrans Outreach

FACTOR 3:

The nature and importance of programs, activities or services provided by SamTrans to the LEP population.

“The more important the activity, service or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed”¹

SamTrans is a critical mobility service for the entire Peninsula region, providing the only fixed-route bus service in San Mateo County. For many, it is the only method of public transportation from the Western coastal areas of the County to the more metropolitan areas of the County. Similarly, SamTrans provides vital services to connect riders to the Bay Area Rapid Transit (BART) system and Caltrain services for regional transportation to other parts of the Bay Area. SamTrans Paratransit, Redi-Wheels, and Redi Coast services provide residents with access to Adult Day Care services and appointments. SamTrans Fare program allows for individuals who are disabled or low-income to access transit. SamTrans buses are also used for many students to access schools in San Mateo County.

Many of SamTrans programs revolve around providing information on how to access these mobility services. There are a number of key interaction points with the bus system which could prove problematic for LEP individuals without translation or interpretation help.

- Currently SamTrans disseminates all information in English, with service changes and public hearing notices available in Spanish and Chinese. Onboard announcements are made in English, with some announcements translated to Spanish for the benefit of patrons. Customer service personnel all speak English, with some speaking Spanish or other languages. All content on SamTrans’ website is available for immediate translation into 19 different languages through the Google Translate tool on the webpage. The following represents the most important venues or information types for purposes of ensuring language use is not a barrier to access:
 - Customer Service Call Center
 - Service and fare change information
 - Public meeting and public hearings
 - Notice of Title VI Rights and complaint form
 - Rider’s Guide to access non-fixed route services
 - Forms to apply for passes and access to paratransit and on-demand services

¹ Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons—A Handbook for Public Transportation providers, 2007

- Given that SamTrans is the main mobility agency in San Mateo County for residents, SamTrans will continue to assess and identify program components that may require language assistance to LEP customers. This includes access to materials for Board meetings, citizens advisory committees, and virtual town halls. These meetings provide critical information related to service and fare changes.

FACTOR 4:

The resources available to SamTrans and overall cost to provide LEP assistance.

SamTrans currently provides a variety of translation and interpretation to ensure that language proficiency is not a barrier to access SamTrans' services and programs. Not only does SamTrans translate many documents, such as take-ones, ad cards, market research surveys, and materials on fare increase and service changes into Spanish and Chinese – the predominant languages in the area – but SamTrans will continue to improve public noticing translation, and support project translation and interpretation in community-identified languages.

Beginning fiscal year 2025, SamTrans' costs for translators, outsourced translation, and interpretation are consolidated into the Office of Civil Rights' budget. The Office of Civil Rights estimated the total budget for translations and interpreters by reviewing past annual invoices to the external language vendor from all District departments and asking departments about their anticipated needs for the upcoming year. Previously, costs were split among several different departments, depending on which department was responsible for the outreach project being undertaken. Typical annual expenses for interpretation and translation are as follows:

- Other Contracted Services (Including interpretations): \$151,503
- Public meetings/hearings: \$780
- Document and Form Translation: \$7,786
- Printing and Information Services: \$6,522
- Market research: \$3,768 every three years

In the past three years, SamTrans has increased translation and interpretation in Spanish and Chinese for Planning and Communications efforts. As a rule, public hearing notices, committee member application forms, surveys, and service change documents have been translated. SamTrans continues to develop better processes internally to ensure language does not create a barrier to all SamTrans services and to participate in meaningful public engagement, including an increased virtual multilingual presence. Over the last year, the Office of Civil Rights has developed a new streamlined internal process to handle requests and submissions of translation and interpretations from all agency departments. This process has increased awareness across the agency on the importance of translations for LEP customers and has subsequently resulted in more materials being translated into Spanish and Chinese, and occasionally additional languages depending on the target audience.

SamTrans will continue to provide market research surveys to its customers in the top tier languages of Spanish and Chinese to gather valuable insights from riders, helping the agency better understand LEP rider experiences and improve services. As language needs evolve in various parts of the community, SamTrans will monitor the trend of languages spoken by LEP customers to determine the need for translation of surveys and non-vital documents into additional languages past Spanish and Chinese.

With the prevalence of virtual meetings, captioning and interpretation have been normalized in the meeting planning process. Multilingual meetings are managed by the vendor to ensure the audience and speakers understand the role of the interpreter and the difference between consecutive and simultaneous interpretation. Further, staff have incorporated advanced preparation for the public to request interpretation and translation services and for SamTrans to provide interpreters, translated materials, and links to such materials in the public meeting invite or project webpage.

RECOMMENDATIONS FOR LAP IMPLEMENTATION

SamTrans recognizes the importance of providing adequate accessibility for LEP customers to SamTrans services and information. While SamTrans currently complies with all federal and state mandates in regard to Title VI and other requirements, more can be done to ensure that LEP populations are provided with the transit services they need and to ensure the communities are satisfied with such services.

With the increased use of QR codes scannable by phone, an improved website accessible by QR codes could be helpful for passengers looking for written information or are uncomfortable calling.

Moving forward, SamTrans staff will:

- Better coordinate with all departments, especially within Communications, to ensure proper outreach to target LEP populations is conducted
- Work with Google Translate or other outside translation services to improve SamTrans website translations
- Increase use of symbols / pictograms and other non-written forms of communication to allow for important information to be disseminated to those who are LEP
- Document effective processes for promoting multilingual materials on the website
- Update and continue collaboration with newly identified CBOs
- Outreach to CBOs on community preferences for translation and oral interpretation